

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LEAD CREATION INC.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE "A",

Defendants.

Case No. 1:22-cv-10377

**Defendants' Notice Of Motion To
Block Plaintiff's Attempted
Dismissal of this Action Without
Prejudice**

Judge Jesse Furman

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Beixiao Robert Liu, Esq. including the exhibits annexed thereto, and all prior pleadings and filings, Defendants Shenzhen Sen Zhi Run Dian Zi Shang Wu Co., Ltd. and Haikoushi Lvquan Trading Co., Ltd. will move before the Honorable Jesse Furman, at Courtroom 1105 of the Thurgood Marshall United States Courthouse, 40 Centre Street, New York, NY 10007 on March 24 at 10:00 A.M., or an earlier return date in the interests of justice if the Court should so order, given the extent of the injuries that Defendants have already suffered, for an Order blocking Plaintiff's attempted dismissal of this action without prejudice, and for any other and further relief as the Court deems proper and just.

Dated: New York, NY
March 10, 2023

Respectfully submitted,

/s/ Beixiao Liu

Beixiao Robert Liu (Bar #: 5697552)

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